

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**In re
STEVEN A SWAN and
MELISSA J SWAN**

**CASE NUMBER: 19-10811-PMM
CHAPTER 13**

Debtors

**MOTION OF DEBTORS FOR PRO HAC VICE ADMISSION
OF JOSHUA RI COHEN TO PURSUE AN ADVERSARY ACTION
TO DISCHARGE STUDENT LOANS**

Pursuant to Local Bankruptcy Rule 2090-1(b) and 9014-2 of the local rules of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Debtors, Steven and Melissa Swan move this Court for Admission of the Joshua RI Cohen who is licensed in Vermont and Connecticut to prepare, file, and prosecute an adversary action to discharge student loans.

1. Debtor filed a Chapter 13 Petition on February 7, 2019.
2. Scott F. Waterman was appointed as the Chapter 13 Trustee in this matter.
3. Debtor intends to retain special counsel to prepare, file, and prosecute an adversary action to discharge student loan 11 U.S.C. 523a(8).
4. Joshua RI Cohen of Cohen Consumer Law is an experienced attorney in student loan matters who frequently lectures on the subject, including the Eastern District of Pennsylvania.
5. Joshua RI Cohen can be contacted at Cohen Consumer Law, PO Box 1040, St. Albans, VT 05478, phone number 802-380-8887 and e-mail address, jcohen@thestudentloanlawyer.com.
6. Joshua RI Cohen is sponsored by the undersigned attorney, Patrick J. Best, Esquire who requests that the Court admit this attorney to serve as Debtors' attorney in the intended student loan adversary action.

7.Mr. Cohen's admissions include the State and Federal courts in both Connecticut and Vermont, in addition to Federal Districts of EDMI and EDNY, and is currently admitted pro hac vice in this court on another matter where he is doing the same, discharging student loans (24-10848-AMC).

8.He is an attorney in good standing in those courts and not subject to any disbarment or suspension or disciplinary action previously or now pending.

WHEREFORE, Debtors request that this Court enter an Order for the admission of attorney Joshua RI Cohen, pro hac vice in the Eastern District of Pennsylvania Bankruptcy Court to file and prosecute a student loan related adversary proceeding.

Dated April 12, 2024

Respectfully Submitted,

/s/ Patrick J. Best

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